

EXHIBIT 7

Videotaped Deposition of
Stacy Abrams
March 03, 2023

Freeman

vs.

Deeks

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Freeman vs.
Deebs

Stacy Abrams

1 is exactly what Liz is looking for, ordinary girl into
2 super rarefied world."

3 Do you see?

4 A Yes.

5 Q Okay. Based on that, is it accurate to say
6 that you communicated to Tracy Wolff prior to
7 April 26th, 2019 that Entangled wanted to hire her to
8 write a book about an ordinary girl in a super rarefied
9 world?

10 MR. HALPERIN: Objection to form. And let me
11 just clarify. You're asking only based on what is
12 written to this email and not --

13 MR. PASSIN: You know, it's objection -- a
14 speaking objection. If you have an objection, make it.
15 I'm really close to calling the magistrate.

16 If you have an objection, make it.

17 MR. HALPERIN: I wasn't --

18 MR. PASSIN: Make your objection.

19 MR. HALPERIN: I'm making my objection.

20 MR. PASSIN: No.

21 MR. HALPERIN: You interrupted me.

22 MR. PASSIN: No.

23 MR. HALPERIN: And I just wanted to clarify.

24 MR. PASSIN: You're asking questions. Make an
25 objection.

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Freeman vs.
Deebs

Stacy Abrams

1 MR. HALPERIN: I can't clarify a question? I'm
2 sorry. I don't --

3 MR. PASSIN: No, you can't.

4 MR. HALPERIN: If you're asking based on this
5 email or based on like, without her having --

6 MR. PASSIN: I asked a question. Would you
7 read it back, please.

8 (The following was read by the reporter:

9 Q. Okay. Based on that, is it accurate to say
10 that you communicated to Tracy Wolff prior to
11 April 26th, 2019 that Entangled wanted to hire
12 her to write a book about an ordinary girl in a
13 super rarefied world?)

14 MR. HALPERIN: You can answer the question if
15 you understand it.

16 THE WITNESS: Yes.

17 BY MR. PASSIN:

18 Q Okay. Was the communication oral, or written?

19 A Oral.

20 Q Was it face to face, or over the telephone?

21 A Telephone.

22 Q Was anyone else on the phone other than you and
23 Tracy Wolff?

24 A No.

25 Q And when did that communication take place?

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Deebs

Stacy Abrams

1 A I don't recall exactly. But, likely, a few
2 days before Friday, April 26th of 2019.

3 Q Did you approach Tracy Wolff, or did she
4 approach you about working with Entangled?

5 MR. HALPERIN: Objection to form.

6 THE WITNESS: I approached her.

7 BY MR. PASSIN:

8 Q What did Liz Wolff say in the conversation in
9 response to your saying that Entangled wanted her to
10 write a book about an ordinary girl in a super rarefied
11 world?

12 A She was excited to send me some ideas.

13 Q Let's take a look at the attachment, Exhibit 8.

14 A I have not downloaded it yet.

15 Q You're pretty efficient at that, I must say.

16 A I have a fast WiFi connection. It's up. But
17 it's a handful of pages long. Do you need me to --

18 Q I'll direct you. Do you want to read it -- I
19 mean, I'm going to direct you to the one you need to
20 read.

21 A Okay.

22 Q It's up to you.

23 A No, go ahead.

24 MR. HALPERIN: She's entitled to read it if she
25 wants to read it.

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Freeman vs.
Deebs

Stacy Abrams

1 A I believe it was.

2 Q Okay. And does the attachment contain the five
3 basic ideas prepared by Tracy Wolff that you wanted --
4 that she wanted you to look at?

5 A Yes. It appears there are five ideas in here.

6 Q And is it fair to say that basically this is
7 the initial creation of the Crave book series?

8 MR. HALPERIN: Objection to form.

9 THE WITNESS: I don't recall if we officially
10 approved any one of these ideas. This was just the
11 initial conversation.

12 MR. PASSIN: Well, let's mark as Exhibit 9 a
13 document Bates stamped ENTANGLED_0016949 through
14 ENTANGLED_0016950, which is an email chain between you
15 and Tracy Wolff and sometimes Emily Kim, dated
16 April 26th, through 12th, 2019.

17 (Exhibit 9 was marked for identification.)

18 BY MR. PASSIN:

19 Q If you want to take a look at that, please.

20 A May I have a minute to --

21 Q Yes.

22 A -- read this? Okay.

23 Q Okay. Let's -- let's -- okay.

24 Do you recall -- excuse me.

25 Did -- did you -- were you -- did you send and

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Freeman vs.
Deebs

Stacy Abrams

1 receive these email chains on or about May 1, 2019
2 through April 26th, 2019?

3 A These all appear to be in late April. But yes.

4 Q Okay. So you did receive and send these
5 emails?

6 A It appears so, yes.

7 Q And, by the way, Tracy Deebs, I take it is
8 Tracy Wolff's pen name?

9 MR. HALPERIN: Objection to form.

10 BY MR. PASSIN:

11 Q Tracy Wolff is Tracy Deebs' pen name?

12 A Yes. Tracy Wolff is the pen name.

13 Q Okay. Let's take a look at the second email in
14 the chain from the bottom. Okay.

15 A Mm-hmm.

16 Q So that would be -- let me find what I'm
17 looking for. Hold on one second. I'm having trouble
18 finding what I wanted. Hold on a second.

19 Okay. I found it. All right. So the second
20 email in the chain is April 26th, 2019 at 4:29 p.m.
21 It's at the bottom of the first page.

22 Do you see in the first paragraph the second
23 sentence, it says "I spoke with Liz about it, and we
24 both agreed that the one closest to specifically what
25 she's looking for is No. 2."

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Deebs

Stacy Abrams

1 Do you see that?

2 A Yes.

3 Q Okay. So does Liz refer to Liz Pelletier?

4 A Yes.

5 Q And by that comment, you mean that you and Liz
6 thought that idea 2 in the exhibit we looked at a few
7 minutes ago is the closest to the an ordinary girl in a
8 super rarefied world idea?

9 A Essentially.

10 Q Okay.

11 A Those were Tracy's words, not ours.

12 Q All right. Let me read you the third paragraph
13 of that email. Hold on one second.

14 "Anyway, in regards to No. 2, she said she does
15 prefer the hero to be a vampire, if you're open to that.
16 And that we need to develop it a little bit more so that
17 it doesn't sound quite as Twilight (or Vampire Academy,
18 though she really did like the school setting). We need
19 to develop more of a reason as to why he can't be with
20 her other than that he lives in a dark and dangerous
21 world. So what it boils down to is a creative reason a
22 vampire can't be with a human, something that hasn't
23 been done before. No pressure. (And a reason for why
24 he's an asshole to her)."

25 Do you see that?